

GREENBERG FREEMAN LLP

Sanford H. Greenberg
sgreenberg@greenbergfreeman.com

110 East 59th Street
New York, New York 10022
Tel 212.838.9738
Fax 212.838.5032
www.greenbergfreeman.com

August 18, 2015

BY ECF

Honorable Paul A. Engelmayer
United States District Judge
United States Courthouse
40 Foley Square
New York, New York 10007

Re: Permission Data, LLC v. Newsmax Media, Inc.
14-cv-7129 (PAE)

Dear Judge Engelmayer:

I represent plaintiff Permission Data, LLC.

I am writing to request an extension of time for Permission Data to respond to the August 17, 2015 letter of James G. Sammataro, counsel for defendant Newsmax Media, Inc., seeking an informal conference to resolve a discovery dispute.

Mr. Sammataro filed his letter yesterday afternoon while I am in Los Angeles for two non-party depositions in this action noticed by Mr. Sammataro. The last deposition is on Thursday and I am returning to New York on Friday (arriving in New York late evening). I am a small firm practitioner and need time to complete the depositions in Los Angeles, return to New York and prepare a response to Mr. Sammataro's letter.

Accordingly, I respectfully request an extension of time until Monday, August 24, 2015, to respond to Mr. Sammataro's letter.

Respectfully submitted,

/s/ Sanford H. Greenberg

cc: James G. Sammataro, Esq. (by ECF)